

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts

D.T.E. 01-20

**AT&T'S TWENTY-NINTH SET OF INFORMATION
REQUESTS TO VERIZON**

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

INFORMATION REQUESTS

ATT-VZ 29-1

Refer to rebuttal testimony of Joseph Gansert. At p. 29, lines 13-15, Mr. Gansert asserts "There is nothing in an actual telephone network that is equivalent to the 'logical rings' assumed by the Model -- all SONET rings are quite physical."

- a. Please provide all public and Verizon documents that support this contention there is nothing in the actual telephone network that is equivalent to the logical rings assumed by the model or the differentiation between logical rings and physical rings.
- b. Is Mr. Gansert or Verizon in possession of any documents that DO differentiate between logical and physical rings (using those terms or equivalent terms to indicate that the connectivity of the nodes on a ring as defined by SONET circuits may be different from the connectivity of the rings as defined by the actual physical fiber facilities that connect those offices)? If so, provide each and every such document.
- c. Does Mr. Gansert's assertion apply only to the Verizon network in Massachusetts, or is it his contention that it applies generally to all local telephone networks in the U.S.? In other countries?
- d. Is it Mr. Gansert's contention that every node on a Verizon interoffice ring terminates every DS-3 appearing on every fiber in the facilities that make up that ring?
- e. If the answer to part d. is yes, then respond to the following:
 - i) how many fibers are terminated in a given add-drop multiplexer located at a node on a ring?
 - ii) what is the average number of fibers in the interoffice fiber optics cables deployed by Verizon? If this information is not available, state the range of cable sizes (fiber optics strand counts) of interoffice fiber optics cables being deployed by Verizon.
 - iii) to the extent either the average or range of cable sizes given in the answer to part ii), above, exceeds the answer given in part i), above, please explain the purpose of the additional fiber strands in the cable. Give a specific answer as to how these strands will be used, now or in the future. (Simply stating "they are for future growth" or other such general answer is not sufficient.)
- f) Has Mr. Gansert ever been directly involved in the planning of an

interoffice network for Verizon in Massachusetts? If so, please respond to the following:

- i) Describe Mr. Gansert's role and job responsibilities in connection with such planning and state the period of time during which he was involved in such planning.
- ii) Describe the nature of each project that Mr. Gansert was involved in the planning of
- ii) Provide all notes, documentation, and workpapers, including any and all circuit diagrams, facilities diagrams, and the like that describe each of those specific networks, whether prepared by Mr. Gansert or another Verizon employee.

Respectfully submitted,

Jeffrey F. Jones
Kenneth W. Salinger
Jay E. Gruber
Emily R. Donovan
Kevin R. Prendergast
Palmer & Dodge LLP
One Beacon Street
Boston, MA 02118
(617) 573-0100

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